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October 27, 2021

**Hon. Mag. Judge Mann  
United States District Court  
225 Cadman Plaza East  
Brooklyn, NY  
11201**

**Writer's Direct Line  
201-953-4450**

Re: Sandra Heras v MLI

**Dear Judge Mann,**

I want to respectfully report that the s. 30(b)(6) deposition witness was instructed to provide class information for recruiters since August 16 of 2018 pursuant to this Court's ruling of 9/28/2021(dkt. 57) at the Rego Park location.

The Plaintiff appears to have unilaterally, and without Court permission, extended the class to 2013, and seeks information since that time from the s. 30(b)(6) witness, and is apparently aggravated the Defendants will not provide it notwithstanding this Court's Order.

Defendants also respectfully submit that Plaintiff's counsel's conduct is highly unprofessional and for that reason seek sanctions against him.

**Sincerely,**

**/s/**

**Chris Rykaczewski, Esq.  
Attorney for Defendants**